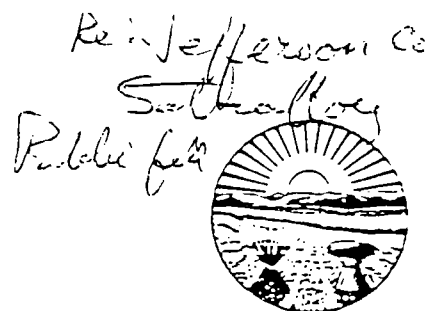




## State Of Ohio Environmental Protection Agency

Southeast District Office  
2195 Front Street; Logan, Ohio 43138 -9031

(614) 385-8501



Richard F. Celeste, Governor

September 9, 1986

Re: JEFFERSON COUNTY  
SATRA CONCENTRATES, INC.

Satra Concentrates, Inc.  
P.O. Box 536  
Steubenville, Ohio 43952

Attention: Lou A. DiPaolo

Sir:

On September 3, 1986, I met with you at the Satra Concentrates facility to discuss solid waste materials being generated and disposed of at the plant.

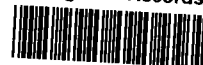
Slag, which is processed by the plant, is not considered a solid waste by Ohio law. But current operations being conducted at the plant concern the recovery of alloy from the low carbon slag by use of a water concentration process. This particular operation generates a sludge waste.

From analytical data supplied by your company at our request, it appears that the sludge generated by the described alloy extraction process is not hazardous. Since the waste is apparently non-hazardous, it falls in the description or category of solid waste. You indicated further that baghouse dust is or was also disposed of on-site. This material is also considered a solid waste.

The primary violations created by this situation are as follows:

1. Section 3734.02(C) - Operation of a solid waste disposal facility without a Permit to Install or plans approved by the Director of the Ohio EPA.
2. Section 3734.03 - Open dumping of solid waste.
3. Section 3734.05(A) - Operation of a solid waste disposal facility without a license issued by the Director of the Ohio EPA.

EPA Region 5 Records Ctr.



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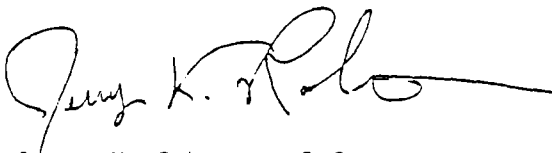
Satra Concentrates, Inc.  
September 9, 1986  
Page 2

In addition, you should also be aware that Section 3734.99 of the current solid waste disposal statute states in part that, "Whoever violates any Section of the Chapter governing the disposal of solid wastes, or violates Section 3734.18 of the Revised Code, shall be fined not more than two hundred fifty dollars. Each day of violation constitutes a separate offense."

Open dumping of solid waste on-site should cease immediately.

All existing solid waste as described herein and all subsequently generated solid waste should be removed to a licensed landfill facility for proper disposal.

Should you have any questions, please contact me at this office.

A handwritten signature in black ink, appearing to read "Jerry K. Roberts", with a long horizontal flourish extending to the right.

Jerry K. Roberts, R.S.  
District Representative  
Division of Solid & Hazardous Waste Management

JKR:dm

cc: Ed Kitchen, DSHWM, CO  
cc: Jefferson County Health Commissioner